

# Kramer Levin



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**May 8, 2023**

Via ECF

The Honorable J. Paul Oetken  
United States District Judge  
Southern District of New York  
40 Foley Square  
New York, NY 10007

Re: United States v. Benjamin, No. S2 21 Cr. 706 (JPO)

Dear Judge Oetken:

We write on behalf of our client Brian Benjamin to respectfully request a modification to the conditions of his release to permit him to travel on the following dates: (i) May 12 to May 14, 2023 to Washington, DC to attend his niece's college graduation; (ii) May 25 to May 29, 2023 to Providence, Rhode Island to attend his college reunion; (iii) June 2 to June 4, 2023 to Boston, Massachusetts to attend his graduate school reunion; and (iv) June 4 to June 5, 2023 to Albany, New York to attend a state senate club dinner. Mr. Benjamin will provide Pretrial Services with a detailed itinerary and continue to abide by all conditions of supervision. The government, by Assistant United States Attorney Jarrod Schaeffer, and Pretrial Services, by Officer Jazzlyn Harris, have advised that they have no objection to this request.

Respectfully submitted,

/s/ Barry H. Berke

Barry H. Berke  
Dani R. James

Granted.  
So ordered.  
5/8/2023

cc: All Counsel (via ECF)

  
J. PAUL OETKEN  
United States District Judge